

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

SHADDE GHNEIM, an individual,

Plaintiff,

v.

CELLCO PARTNERSHIP, d/b/a Verizon
Wireless, a Delaware partnership,

Defendant.

Case No. 2:17-cv-01117 RSL

STIPULATION AND
RULE 502(d) ORDER

I. STIPULATION

The parties stipulate and agree that the production of privileged or work-product protected documents, electronically stored information (“ESI”) or other information, whether inadvertent or otherwise, should not constitute a waiver of the privilege or protection from discovery in this case or in any other proceeding. The Court’s Order should be interpreted to provide the maximum protection allowed by Federal Rule of Evidence 502(d). Any party receiving evidence that is potentially privileged should promptly return such evidence to the producing party and, if disputed, returned evidence may be the subject of discovery conference and motion practice.

The Court’s Order should not serve to limit a party’s right to conduct a review of documents, ESI or information (including metadata) for relevance, responsiveness, and/or segregate privileged and/or protected information before production.

1
2 DATED this 22nd day of June, 2018.

3 CORR DOWNS PLLC

4
5 s/Jacob Downs

6 Jacob M. Downs, WSBA #37982

7 Joseph P. Corr, WSBA #36584

8 Attorneys for Plaintiff

DATED this 22nd day of June, 2018.

JACKSON LEWIS P.C.

s/Barry Alan Johnsrud

Barry Alan Johnsrud, WSBA #21952

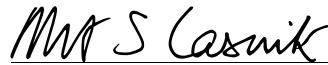
Sherry L. Talton, WSBA #42780

Attorneys for Defendant

9
10 **II. ORDER**

11 PURSUANT TO THE ABOVE STIPULATION, IT IS SO ORDERED.

12 Dated this 27th day of June, 2018.

13 

14 Robert S. Lasnik

15 United States District Judge

16
17 Presented by:

18 DATED this 22nd day of June, 2018.

19 CORR DOWNS PLLC

20
21 s/Jacob Downs

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